

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

CASE NO. 23-80101-CR-CANNON(s)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

_____ /

JOINT PROPOSED JURY QUESTIONNAIRE

In accordance with the Court's order (ECF No. 244) that the parties file a joint proposed jury questionnaire denoting areas of agreement and disagreement, the Government hereby files the attached proposed questionnaire on behalf of all parties.¹

The table below summarizes areas of agreement and disagreement. In addition, the document itself, using color coding, highlights the areas of disagreement. Text in **BLACK** reflects agreed upon language and questions; text in **RED** denotes language and questions the Government proposes to which the defense objects; and text in **BLUE** denotes language and questions the defense proposes to which the Government objects. At the Court's direction, the parties are prepared to file papers explaining the bases for our disagreements.

¹ Earlier today, the Government filed a motion for leave to file the joint proposed questionnaire under seal. *See* ECF No. 344. That motion is now moot.

Summary of Agreement/Disagreement

| | |
|---|--|
| Parties agree | 1-13, 15-31, 35-45, 47, 48, 50-53, 55-60, 61, 67, 68, 83, 95-97, 99 |
| Parties agree to inclusion of question, but differ as to language or style, as denoted by color coding | 14, 46, 49, 54, 65, 69, 70, 73, 91, 92 |
| Government proposes question and defense objects, as denoted by color coding | 66, 71, 72, 74, 75, 76-80, 84-86, 90, 98 |
| Government proposes question and defense objects; if the Court agrees with the Government, the defense requests modified language, as denoted by color coding | 81-82 |
| Defense proposes question and Government objects, as denoted by color coding | 32-34, 62-64, 87-89, 93, 94 |
| Other disagreements, as denoted by color coding | <p>“Knowledge of Trial Participants and the Case” explanation (between questions 60 and 61) – parties disagree as to language.</p> <p>Certification page – parties disagree as to method for signing/anonymizing</p> |

Respectfully submitted,
JACK SMITH
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By: /s/ David V. Harbach, II
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February 28, 2024

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which in turn serves counsel of record via transmission of Notices of Electronic Filing.

/s/ David V. Harbach, II
David V. Harbach, II